



Briefing to Joint Group on Environmental Attributes

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(IDA)

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Objective

IDA was tasked by the DLA-DSS-E to:

- evaluate a number of potential environmental attributes for inclusion in FLIS, and
- assist with implementation



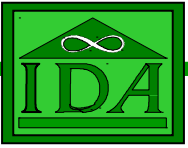
Asbestos Alternative Products





Tasks

- Determine whether "asbestos alternative" meets the criteria as an environmental attribute.
- Develop a procedure for recognizing and identifying asbestos alternative products.
- Determine means for identifying asbestos alternative products in FLIS and implementing in E-Mall.
- Determine ways of identifying unique weapons systems applications.



Criteria for Environmental Attribute

- Policy or Regulatory Priority
 - Clearly Definable
Comprehensive Definition
 - Cost Benefit Must be Evident
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Regulatory Priority Exists

- Basis - Exposure can cause asbestosis and cancer.
- OSHA first regulated occupational exposure in 1971.
- EPA regulated release under CAA & disposal under RCRA
- Under TSCA, EPA attempted to prohibit manufacture, importation, distribution of asbestos-containing products, but was mostly remanded following a court challenge.
- Despite remanding, regulatory framework is in place to support consideration of Asbestos Alternative Products as an environmental attribute.



Definition

- Asbestos Alternative Products have less than 1.0 percent asbestos by weight or area (EPA Test Method, Appendix E -- 40 CFR 763.163, Subpart E) when otherwise equivalent products containing 1.0 percent or more asbestos are also available.



DoD Activities to Identify Asbestos-Containing Products

- Air Force has established a framework for asbestos management and maintains a fact sheet and list of over 46 suspect ACM
 - Navy has sponsored a program with support from DSCP – identified 4000 replacement NSNs for over 9000 previously identified NSNs
 - DSCP has developed standard language for “asbestos alternative” for use in contracts
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Sample List of Suspect Asbestos-Containing Materials

Cement Pipes	Cooling Towers
Cement Wall Board and Siding	Pipe Insulation
Asphalt Floor Tile	Roofing Shingles
Vinyl Floor Tile and Sheet Flooring	Fire Doors
Construction Mastics	Chalk Boards
Acoustical Plaster	Roofing Felt
Ceiling Tiles and Lay-in Panels	Gaskets
Blown-in Insulation	Wallboard
Fireproofing Materials	Adhesives
Packing Materials	Vinyl Wall Coverings
Laboratory Gloves	Caulking/Putties
Fire Blankets and Curtains	
Elevator Brake Shoes	
HVAC Duct Insulation	



Navy Efforts to Manage Asbestos

- Navy is supporting laboratory testing of asbestos compounds presently in use
 - Vendors are supplying replacement compounds and receiving new NSNs
 - Performance specifications require no asbestos
 - New contract requirements for replacement products
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Cost Benefit

- Waste containing asbestos requires disposal in licensed landfills
 - DoD costs for inventory and disposal are increasing (NESHAPS & RCRA)
 - Costs for legally required recordkeeping are increasing
 - Required protective equipment and procedures for handling asbestos are expensive
 - Treatment and disability costs will decline as asbestos-containing products are eliminated
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Barriers to Implementation

- Consumption of asbestos products in U.S. has declined.
- Manufacturers have modified product designs, substituted or eliminated need.
- DLA inventory includes both asbestos-containing products and asbestos alternative products
 - In some cases, one NSN designates both products, sometimes created by voluntary industry substitution
 - In other cases, different NSNs assigned
- For some products, there is no technical alternative to use of asbestos



Recommendations

- JG approve “asbestos alternative products” as an environmental attribute
- Definition: A product that is a replacement for a product previously containing asbestos that contain less than 1.0 percent asbestos by weight or area
- Implement by
 - Entering the DSCP database into FLIS, then add other centers’ products that meet the criteria
 - Determine the number of asbestos containing products that have been replaced by alternatives at other ICPs
 - Confirm that NSNs for asbestos alternative products exclude asbestos products – establish new and delete old NSNs as needed
 - Prepare a press release announcing the new environmental attribute and inform vendors of their interest in other asbestos alternative/replacement products



Third Party Certification





Background

- A report on Third Party Certification as an Environmental Attribute was presented to DoD JGEnAtt in December 2000
- There was general agreement on the concept, but consensus that definition and implementation issues needed further study
- EPA supports use of third parties to certify EPP and standards based on life cycle considerations
- DLA and JGEnAtt supported the concept of a pilot implementation program and further evaluation



Objectives of Study

- Evaluate the feasibility of using Third Party Certification as an Environmental Attribute
 - Identify standards that have been developed for EPP that consider life cycle analysis
 - Develop criteria that can be used to evaluate Third Party Environmental bodies
 - Identify Third Party Organizations and product categories for use as pilot program
 - Develop an implementation plan for a pilot program to test the practicality of using third party
 - Identify barriers to implementation
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Regulatory Policies

- Executive Order 13101 directs the Federal government to improve use of environmentally preferable products.
- EPA Guidance for use of third parties
 - EO implementation guidance
 - Guidance for use of third parties
- OMB Circular A-119 directs use of voluntary consensus standards



Definitions

- Standard is a “recognized unit of comparison by which correctness of others can be determined”
- Third party is “ the form of certification in which the producer’s claim of conformity is validated by a technically competent body”
- Self-declaration is ‘the process by which a manufacturer declares his product meets one or more standard”



Criteria for Third Party Selection Established

- ISO/IEC Guide 65 defines General Requirements for Bodies Operating Product Certification Systems
 - Impartial
 - Transparent
 - Technically Competent
 - Financial Stability
 - Formal organization and rules
 - Mechanism to adjudicate complaints and appeals



Cost Benefit

- Use of third party certification eliminates Government responsibility for
 - Developing its own standards
 - Funding tests of commercial products
 - Certifying commercial products
- Use of third party certified EPP
 - Reduces life cycle costs of products
 - Mitigates environmental effects



Activities

- Reviewed EPA position on use of standard setting and third party certification groups
 - Reviewed American National Standards Institute (ANSI) criteria for consensus standard setting processes
 - Reviewed criteria for evaluating third party organizations using requirements of International Standards Organization (ISO), ANSI and the American Society for Testing Materials (ASTM)
 - Met with third party/standard setting organizations
 - Initiated working sessions with DLA FLIS Team
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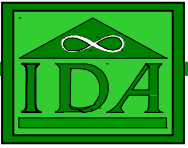
Meetings with DLIS

- Meetings held in Battle Creek with EPRO, EMALL, IGIRDER and Catalogers
- Considerable support for treatment of Third Party Certification as special identifier.
- EPPC (Environmentally Preferred Product Certification) already established as MRC
 - Equivalent to ENAC
 - Has never been used
 - Current definition adequate - indicates the type of certification
 - Easy to implement – simply begin using



Barriers to Implementation

- DLIS cataloguing system does not differentiate between single- and multi-attribute products
 - FIGs include a Master Requirement Code (MRC) to identify EPP using an Environmental Attribute Code (ENAC)
 - A cataloger will generate an ENAC and Reply Code to differentiate the appropriate attribute for EPP
- DLA provides vendors no incentive to expend the resources to obtain certification because it does not differentiate between self-declared and third party certified products.



Recommendations

- Adopt “Third Party Certification”
 - Not an environmental attribute
 - Two Options
 - Change definition of Environmental Attribute to allow 3d Party
 - Test practicality of using EPPC for 3d Party
- IDA Recommends Pilot Program to test EPPC
 - Identify needed connections to FLIS, ERLS, EMALL
 - Estimate time and cost for needed for programming
 - Use Low-VOC as a pilot program
 - SCAQMD-certified products will be given Low-VOC ENAC
 - SCAQMD-certified products will be 3d Party EPPC
 - Identify how ENAC and EPPC are displayed to customers using legacy ordering systems



Cognizant Military Authority





Tasks

- Determine its applicability as an environmental attribute
 - Determine appropriate use, application and means of identifying products
 - Determine what information DLA's customers would need in order to make more informed purchase decisions
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Definition

- “Cognizant Military Authority” in this context means “the organization with the authority to amend the maintenance procedures of a weapons or support system”.
 - Examples:
 - B-52 System Program Office, Oklahoma Air Logistics Center
 - Naval Aviation Depot, Jacksonville
 - Naval Surface Warfare Center, Port Hueneme Division
 - Anniston Army Depot, Center of Technical Excellence for the M1 Abrams Tank
 - No up to date comprehensive list of all organizations has been yet located



Criteria

- Policy or Regulatory Priority
 - Clearly Definable Comprehensive Definition
 - Cost Benefit Must be Evident
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Policy Priority

- USD (AL&T)
 - OSD Acquisition Deskbook
 - Joint Logistics Commanders
 - Defense Contract Management Command
 - Service Implementation Policies
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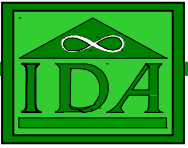
Clear Definition

- Products approved by a cognizant military authority for use on weapons and support systems
- Products recognized by JG-APP, SERDP, ESTCP, cognizant military authorities as environmentally preferable to other products that meet performance requirements



Pollution Prevention Programs Provide Product Pipeline

- Programs
 - Joint Group on Acquisition Pollution Prevention (JG-APP)
 - Service/NASA program, chartered by the JLC to reduce or eliminate HazMats - common problems, shared efforts, joint solutions
 - FASTT
 - Site surveys reduce apply best technology and management practices.
 - Propulsion Environmental Working Group (PEWG)
 - DoD and Industry qualify green products for propulsion / power systems
 - Strategic Environmental Research & Development Program (SERDP)
 - DoD / DoE / EPA develop and transition environmental products
 - Environmental Security Technology Certification Program's (ESTCP)
 - Validates products that target DoD's most urgent environmental needs
- Products: Cost effective, environmentally preferable materials and processes approved by ESAs/Program Offices for use on weapons systems.



Other Produce Sources

- Joint Logistics Commanders
 - Joint Depot Environmental Panel (JDEP)
 - Joint Group on Pollution Prevention (JG-PP)
 - AF/ILM
 - NAVSEA, NAVAIR, NAVSUP
 - Army G-4 staff
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Environmentally Preferable Products Approved by ESAs

Completed JG-APP Projects

Project	Project Objective	NSN Product
J-95-OC-001	Chromate free conversion coating that could be used on all Hughes Missile System programs.	?
J-95-MF-003	Chromium-free primers for inserts and fasteners used in aircraft engines	?
J-95-OC-004	Chemical agent resistant powder paint	?
J-95-OC-002	Chromium-free primers for use on aircraft exterior mold line skins	?
S-98-OC-010	Solvent-free coating for ships, boats and small-craft	?



Cost Benefit

- Single process criteria based on:
 - Life-cycle cost benefit
 - Compelling regulatory mandate (e.g., Montreal Protocol)



Other Potential Products

- PEWG
 - At least 9 products from ongoing projects
 - At least 3 products identified from completed projects
- ESTCP – At least 17 potential products
- FASTT – Multiple products and process changes requiring ESA approval



Potential Products Being Evaluated

17 Ongoing JG-APP projects

Project No.	Product
J -95-MF-006	Cadmium-free coatings for threaded parts
J -00-MF-020	Alternatives to hard chrome electroplating for aircraft flight control and utility hydraulic and pneumatic actuators
J -00-MF-021	Alternatives to hard chrome electroplating for dynamic components
J -98-MF-012	Alternatives to hard chrome electroplating for dimensional restoration of two T-56 engine 54H60 propeller hub part
J -01-EM-026	Lead-free solders
J -96-EM-008	Low-VOC conformal coatings and lead-free surface finishes for use in circuit card manufacturing
J -99-OC-014	Primers and topcoats without VOC, lead or hexavalent chromium for support equipment
J -98-OC-013	Low-VOC organic coatings for medium caliber ammunition projectile bodies
J -95-OC-005	Low-VOC inks and paints used for identification marking
J -99-CL-015	Non-ODCs clean oxygen lines cleaners for aerospace vehicles
J -00-CR-017	Compact, portable, low-powered, handheld laser system for small-area paint removal
S-98-MF-011	Alternatives to hard chrome electroplating for landing gear
S-00-MF-024	Alternatives to cadmium for all DoD and NASA applications
S-95-SP-007	Environmentally preferable dry film lubricants
S-00-OC-016	Nonchromate aluminum pretreatments for DoD aerospace test platforms
J -01-OC-025	Low-VOC adhesive bonding primer for all military platforms



Collaborators

- Met with DSCR – support for Cognizant Military Authority
- To meet with JG-APP, FASTT, SERDP, ESTCP in December



Recommendations

- Adopt Cognizant Military Authority
 - Not an environmental attribute
 - Potential to adopt at EPPC rather than ENAC
- Defer implementation until details can be agreed by “maintenance community”
 - Programs (JG-APP, SERDP/ESTCP, PEWG, FASTT)
 - Service maintenance policy staffs (AF/ILM, NAVSEA, NAVAIR, NAVSUP, Army G-4 staff)
 - Joint Logistics Commanders

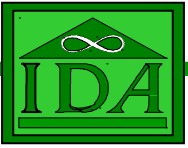


Next Steps

- Identify some specific changes already made for environmental reasons and map process
- Implement in FLIS and determine value to ESAs and field maintenance functions
 - Conduct interviews
 - Work with DLIS to explore coding options that serve DLA customers



Backup Slides



Standards

- American National Standards Institute (ANSI) accredits standards that are developed from a formal, consensus-based process using the following principles:
 - Due process
 - Openness
 - Balance of interest
 - An appeals process
 - Consensus, which is defined as general agreement but not necessarily unanimity, and includes a process of attempting to resolve objections by interested parties



Background

- Weapons systems consumable items are often classified as hazardous materials
- Maintenance materials and processes are prescribed in technical maintenance manuals
- Maintenance manuals are written by OEMs and maintained by OEMs or CMAs
- Changes often require testing and qualification
 - High cost of testing
 - High consequence risk of failure (potential for fatal event)



Challenges

- Scope
 - Thousands of systems, uses, compounds and processes
 - Approval for one use on one system does not mean approved for same use on another system
 - Maintenance Tightly Prescribed
 - ESAs, PMs prescribe specific materials, processes for specific applications on specific systems
 - Do not want field maintenance personnel ordering “environmentally preferable” products not approved
 - Inappropriate use of EPP on weapons systems is a failure to follow approved maintenance procedures
 - Need consensus of “maintenance community” on establishment of attribute and implementation
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Opportunities

- Many substitutions to replace environmentally harmful materials have been approved by ESAs, especially for
 - Cleaning solvents
 - Paint strippers and surface preparations
 - Adhesives
 - Coatings
- Changes to technical manuals very expensive to write, publish and distribute
 - Changes often made through addenda or message traffic
 - Field implementation inconsistent

Is there information helpful to ESAs that
DLA could make available to the field
via FLIS?